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July 19, 2021

Via ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: ***Gran Sabana Corporation N.V. v. Mitchell H. Kossoff***, Case No.
1:21-cv-03154-RA

Dear Judge Abrams:

On behalf of Plaintiff Gran Sabana Corporation N.V. (“Gran Sabana”), and pursuant to the Court’s Order of May 21, 2021, *see* ECF No. 18, we write to provide the Court with a status update. Gran Sabana initiated the above-referenced action on April 12, 2021 against Defendant Mitchell H. Kossoff (“Kossoff”), alleging theft of client funds held in an attorney trust account. *See* ECF Nos. 1-8. Following agreement by the parties, so ordered by the Court, Kossoff had until June 30, 2021 to respond to the Complaint. *See* ECF No. 18.

On June 30, 2021, Kossoff filed an Order to Show Cause for Temporary Restraining Order and Preliminary Injunction, seeking a stay of this case based on Kossoff’s perceived self-incrimination concerns (the “OTSC”). *See* ECF No. 20. On July 1, 2021, this Court entered an Order directing Gran Sabana to respond to Kossoff’s OTSC by July 9, 2021. *See* ECF No. 22. On July 9, 2021, Gran Sabana filed its Opposition to Kossoff’s OTSC. *See* ECF No. 23.

No other deadlines are currently pending.

Respectfully submitted,

/s/ Carolina A. Fornos

Carolina A. Fornos
Partner

cc: All counsel of record via ECF